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November 17, 2011

**VIA ECF AND UPS:**

Honorable Joseph E. Irenas, U.S.D.J.  
United States District Court for the District of New Jersey  
Post Office Building  
401 Market Street, 3<sup>rd</sup> Floor, Suite 310  
Camden, NJ 08101

RE: *Brady v. Air Line Pilots Association*  
Civil Action No. 02-2917

Dear Judge Irenas:

We have Mr. Connell's November 17, 2011 email to your courtroom deputy, Larry MacStravic, advising the Court that ALPA's availability for argument on its own post-trial motions is limited to only one of the three dates proposed by the Court, and it happens to be the only date that Plaintiffs are unavailable due to Mr. Press starting a trial.

Please be reminded when the hearing, previously scheduled for November 4, 2011, was adjourned to December, ALPA had likewise limited availability to appear at argument. We are now five months post liability verdict with no hearing date in sight. Due to the obvious prejudice Plaintiffs are suffering from these continued delays, we renew our request that the Court decide the post-trial motions on the papers and schedule a discovery conference in the near future. Although we have to this point not begun damages discovery due to the pending motions, we intend to serve discovery requests without delay.

Respectfully submitted,

*s/ Lisa J. Rodriguez*

Lisa J. Rodriguez

cc: Dan Katz (via ECF)  
Steve Fram (via ECF)  
John Connell (via ECF)  
Plaintiffs' Counsel (via ECF)